

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROOCHI TRADERS INCORPORATED,

*Plaintiff,*

-against-

TIP TOP TEES INC., GLAMOUR LINE INC.,  
GLAMOUR (USA), INC., ALPHA  
MERCHANDISING CORP., ROSE DEAL,  
INC., HARYASH PAUL, MOHAMMED  
RAHMAN, MOHAMMED FAROQUE, JOHN  
DOES 1-10, JANE DOES 1-10, and XYZ  
COMPANIES 1-10,

*Defendants.*

CIVIL ACTION NO.

[FILED UNDER SEAL PURSUANT TO  
15 U.S.C. § 1116]

**DECLARATION OF STEPHEN G. WARD**

I, Stephen G. Ward, hereby declare as follows:

1. I am a New York State licensed private investigator and the owner of Trademark Associates of NY, Ltd. ("TANY"), located at 61 Broadway, 18th Floor, New York, New York 10006. I have owned TANY since 2002, and I have been a licensed private investigator for 15 years. I have overseen, conducted and/or participated in approximately 300-500 trademark investigations involving counterfeit and infringing goods. I am familiar with

investigations regarding counterfeit apparel, including t-shirts, and the New York City garment industry.

2. I was recently retained by Kenyon & Kenyon LLP to investigate Haryash Paul, the owner of Tip Top Tees, Inc. ("Tip Top Tees"), which is located at 10 West 28th Street, 2nd Floor, New York, New York 10001, to determine if Tip Top Tees imported, sold, offered to sell or was selling counterfeit COTTON HERITAGE t-shirts (the "Counterfeit Products").

3. I submit this declaration in support of Plaintiff's Motion for an Order to Show Cause for a (1) Temporary Restraining Order, (2) Preliminary Injunction, (3) Seizure Order, (4) Asset Restraining Order and (5) Order for Expedited Discovery. The facts stated herein are based on my personal knowledge, review of public records, and/or facts told to me that I believe to be true. If called to testify regarding same, I could do so competently. I have personal knowledge of the investigation of the Counterfeit Products, Mr. Paul, Tip Top Tees and its related entities. According to my investigation, Mr. Paul has used the following addresses as residences: 50-11 38th Street, 3rd Floor, Long Island City, New York 11001; 17 Westmoreland Road, Hicksville, New York 11801; and 1220 Broadway, Room 402, New York, New York 10001. Mr. Paul owns, controls and operates a number of companies in addition to Tip Top Tees:

<b>Glamour Line, Inc. ("Glamour Line")</b>	1220 Broadway Room 402 New York, New York 10001  108-46 63rd Avenue Forest Hills, New York 11375
--------------------------------------------	-----------------------------------------------------------------------------------------------------------------

<b>Glamour (USA), Inc. ("Glamour USA")</b>	1220 Broadway Room 402 New York, New York 10001
<b>Alpha Merchandising Corp. ("Alpha Corp.")</b>	10 West 28th Street New York, New York 10001  303 Fifth Avenue, No. 1608 New York, New York 10016

True and correct copies of print-outs from New York State's Division of Corporate Records for the above-referenced entities are attached hereto as Exhibit A.

4. I conducted Dun & Bradstreet searches on each aforementioned entity and officers and was unable to locate any one with a true profile.

5. Through the course of my investigation of a database, which is available to licensed and vetted private investigators, I determined that there are two separate voter registration records linked to Mr. Paul's 17 Westmoreland Road address. One voter registration record is for Haryash Paul, a male with a date of birth of May 24, 1951, and the other voter registration record is for a "Maryash Paul", a female who lists the same home address and date of birth. My investigation revealed a female known by the name Fnu Neetika is linked to Mr. Paul's 17 Westmoreland Road address and his other addresses. Ms. Neetika also uses the following aliases: Neetika Paul and Anika Paul. Based on my investigation, I could not determine Ms. Neetika's role in the counterfeiting operations.

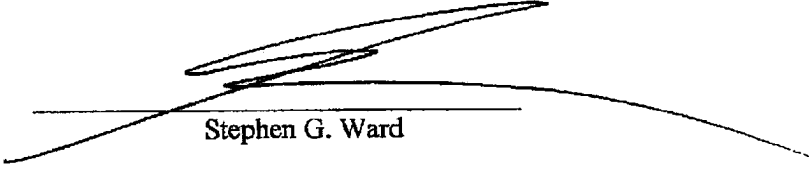
6. On or about March 26, 2008, I directed Miguel Sampario, an employee of TANY, to contact Mr. Paul to purchase t-shirts from Tip Top Tees.

7. Based on photographs provided to me by Kenyon & Kenyon LLP, which depicted that the Counterfeit Products were shipped in boxes with "ROSE DEAL COTTON-TEES USA" markings, I conducted an investigation of Rose Deal, Inc. ("Rose Deal"), a New York corporation, located at 3302 Broadway, Astoria, New York 11106. Kenyon & Kenyon LLP provided that a Mohammed Rahman was connected to Rose Deal. Based on our investigation, a "Mohammed Faroque" is linked to Rose Deal. Mr. Faroque's defunct corporation, Sonargapon Enterprises Corp., shares the same address as Rose Deal (e.g., 3302 Broadway, Astoria, NY 11106). Based on information provided to me by Kenyon & Kenyon LLP and my own investigation, it appears that Rose Deal is also located at 34 Giles Avenue, Jersey City, New Jersey 07306.

8. Based on my experience, without a Temporary Restraining Order and Seizure Order, upon learning of legal action, defendants quickly dispose of or hide the Counterfeit Products and the business records related thereto. In addition, experience in other cases has shown that, without the requested relief, a plaintiff will find it difficult, if not impossible to track the sources of the Counterfeit Products.

I declare under penalty of perjury that the foregoing is true and correct to the best of my information and belief.

Executed on this 9<sup>th</sup> day of April.

  
Stephen G. Ward

## **EXHIBIT A**

# NYS Department of State

## Division of Corporations

### Entity Information

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Selected Entity Name: TIP TOP TEES INC.

#### Selected Entity Status Information

**Current Entity Name:** TIP TOP TEES INC.

**Initial DOS Filing Date:** FEBRUARY 05, 2007

**County:** NASSAU

**Jurisdiction:** NEW YORK

**Entity Type:** DOMESTIC BUSINESS CORPORATION

**Current Entity Status:** ACTIVE

#### Selected Entity Address Information

**DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)**

RAJEEV KAUL CPA PC

303 FIFTH AVE. # 1608

NEW YORK, NEW YORK, 10016

#### Registered Agent

NONE

NOTE: New York State does not issue organizational identification numbers.

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# NYS Department of State

## Division of Corporations

### Entity Information

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Selected Entity Name: GLAMOUR LINE INC.

#### Selected Entity Status Information

**Current Entity Name:** GLAMOUR LINE INC.

**Initial DOS Filing Date:** SEPTEMBER 25, 1998

**County:** QUEENS

**Jurisdiction:** NEW YORK

**Entity Type:** DOMESTIC BUSINESS CORPORATION

**Current Entity Status:** ACTIVE

#### Selected Entity Address Information

**DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)**

GLAMOUR LINE INC.

108-46 63RD AVENUE

FOREST HILLS, NEW YORK, 11375

#### Registered Agent

NONE

NOTE: New York State does not issue organizational identification numbers.

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# NYS Department of State

## Division of Corporations

### Entity Information

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Selected Entity Name: GLAMOUR (USA), INC.

#### Selected Entity Status Information

**Current Entity Name:** GLAMOUR (USA), INC.

**Initial DOS Filing Date:** OCTOBER 24, 1995

**County:** QUEENS

**Jurisdiction:** NEW YORK

**Entity Type:** DOMESTIC BUSINESS CORPORATION

**Current Entity Status:** ACTIVE

#### Selected Entity Address Information

**DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)**

C/O DALJIT SINGH

80-15 41ST AVENUE, APT. 502

ELMHURST, NEW YORK, 11373-1259

#### Registered Agent

NONE

NOTE: New York State does not issue organizational identification numbers.

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# NYS Department of State

## Division of Corporations

### Entity Information

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Selected Entity Name: ALPHA MERCHANDISING CORP.

#### Selected Entity Status Information

**Current Entity Name:** ALPHA MERCHANDISING CORP.

**Initial DOS Filing Date:** JANUARY 18, 2006

**County:** NEW YORK

**Jurisdiction:** NEW YORK

**Entity Type:** DOMESTIC BUSINESS CORPORATION

**Current Entity Status:** ACTIVE

#### Selected Entity Address Information

**DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)**

RAJEEV KAUL

303 FIFTH AVE #1608

NEW YORK, NEW YORK, 10016

#### Registered Agent

NONE

NOTE: New York State does not issue organizational identification numbers.

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